# EXHIBIT B

From: **Thomas Wolle Patrick Evans** To:

Cc: Janet Ives; smitmcel@aol.com

Subject: Re: McKnight v. CRST Transportation - Amending the Complaint

Date: Thursday, January 16, 2025 10:50:33 PM

Patrick, we would not oppose any motion for leave to amend your complaint.

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# **Thomas Wolle**

Member



# Simmons Perrine Moyer Bergman PLC

115 3rd Street SE, Suite 1200 Cedar Rapids, Iowa 52401 Telephone: (319) 896-4007

Email: twolle@simmonsperrine.com

Website: www.spmblaw.com

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**From:** Patrick Evans <dpevans@evanslawpc.com> **Sent:** Thursday, January 16, 2025 10:50:01 AM To: Thomas Wolle <twolle@simmonsperrine.com>

Cc: Janet Ives <jbives@evanslawpc.com>; smitmcel@aol.com <smitmcel@aol.com>

Subject: Re: McKnight v. CRST Transportation - Amending the Complaint

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### Thomas,

Our deadline to amend parties and claims is February 28, 2025. During our last call, I mentioned I planned on amending the complaint to include additional Plaintiffs or file a separate action. I am currently drafting an amended complaint to add additional Plaintiffs. Their facts and causes of action are similar to those of Mr. McKnight's. I am also amending the complaint to remove references to the Alabama state law claims as

all claims now fall under Iowa Law. My goal is to have the motion to amend and amendment finished by next week. Please let me know whether or not Defendants oppose a motion for Plaintiff to leave and amend.

I think it makes more sense to amend the present action within the timeframe provided than to file a separate multi-plaintiff action in Iowa with Plaintiffs who have similar facts/claims as McKnight. I imagine CRST would seek to consolidate any new multiplaintiff action with McKnight's at least for discovery purposes.

I am happy to jump on a call if you have any questions.

# Thanks.

#### Patrick Evans

D. Patrick Evans The Evans Law Firm, P.C. Attorneys at Law 1736 Oxmoor Road Birmingham, Alabama 35209 Phone: 205-870-1970

Fax: 205-870-7763

Website: www.evanslawpc.com



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